United States Government

Department of Energy

Rocky Flats Field Office

memorandum

DATE: MAR 0 3 1995

REPLY TO ATTN OF: ER:WNF:08195

SUBJECT: Operable Unit No. 15, "Inside Building Closures," Meeting Synopses

TO: Richard J. Ray, Operable Unit No. 15 Project Manager
Environmental Restoration Programs Division
EG&G Rocky Flats, Inc.

This purpose of this memorandum is to transmit copies of the Stakeholder Database Meeting Synopses, which pertain to the Meetings held with the Regulators in 1994 and to date in 1995 pertinent to Operable Unit (OU) No. 15.

As requested, these Synopses are being forwarded for inclusion in the OU 15 Administrative Record.

If you have any questions or comments, please contact me at extension 4013.

William N. Fitch, Manager
Operable Unit No. 15
Environmental Restoration

Attachment

cc w/o Attachment:
J. Roberson, AMER, RFFO
J. Wienand, ER, RFFO
S. Stiger, EG&G
D. Schubbe, EG&G

ADMIN RECORD

#000053237

DRAFT

MEETING BETWEEN DOE, EG&G, CDH AND EPA PERSONNEL TO DISCUSS THE OU-15, INSIDE BUILDING CLOSURES, IHSS CLOSURE PROCESS

June 10, 1994

ATTENDEES

NAME:	PHONE:	FAX:
W. Fitch, DOE/ER	966-4013	966-4871
R. Hyland, DOE/RTG	966-2136	966-4871
D. Maxwell, EPA	294-1082	294-7559
J. Swanson, CDH	692-3416	782-4969
R. Ray, EG&G	966-8557	966-8556
R. Hea, ERM-RM	741-5050	777-2624

SYNOPSIS

Personnel from the EPA, CDH, EG&G and DOE/RFFO met to discuss the OU-15, Inside Building Closures, strategies for the "close-out" of the OU. The following is a brief synopsis of this meeting which occurred at 10:00 AM on June 10, 1994, at the Rocky Flats Plant Site – T-117A, CR #67, Golden, CO.

Dr. Fitch opened the meeting and provided an update relative to the current status of the OU-15 activities. In this effort Dr. Fitch was aided by Mr. Ray.

Dr. Fitch asked the EPA and CDH representatives if, based upon the information contained in the Final TM-1, they thought that the IHSSs; could be closed?

Mr. Swanson responded that, although the Final TM-1 answered most of the comments that CDH had with respect to the Draft TM-1, there were still some questions remaining relative to the presence of certain compounds in three of the IHSSs, otherwise, it appeared that the RCRA closures could be effected. These IHSSs and the associated compounds are: IHSSs 178 and 211(DEHP, phenol & methylene chloride) and IHSS 217 (CN).

Dr. Fitch responded to Mr. Swanson that verification sampling was presently being conducted in the IHSSs. CN was not detected in IHSS 217. It is anticipated, due to the sampling regimen, that DHP, et al. would not be found at the other two IHSS locations.

Mr. Swanson stated that if no contamination was found, then RCRA closure of the IHSSs could be accomplished.

Dr. Fitch then broached the main purpose of the meeting: to discuss the possible courses of action to reach closure relative to the radiological contamination in the OU-15 IHSSs, especially activities needed beyond those currently identified in the OU-15 Phase I RFI/RI Work Plan. A logic diagram was distributed, for discussion purposes, which depicted a possible sequence of events to achieve closure and which included an Interim Record of Decision (IROD). Additionally, a excerpt from a paper presented by Fernald personnel at a recent D&D conference, which identified the utilization of an IROD was passed out.

A rather forthright and candid discussion between the meeting participants relative to the process/activities necessary to close the OU-15 ensued, which yielded the following:

The possible presence of radionuclides under the painted IHSS floor surfaces poses a problem for unrestricted access; however, the use of adequate institutional/administrative controls, as is the current practice in the building, is sufficient for controlled access by trained radiation workers.

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The current work plan calls for surficial sampling using swipes for radionuclides and beryllium, and rinsate sampling for hazardous and toxic substances. Use of a High Purity Germanium (HPGe) detector could enable isotope identification characterizing the nature and extent of radiological contamination embedded in and underneath the painted floor surfaces. Application of this technique is not included in the current work plan. DOE would have to propose, and the EPA and CDH would have to approve, the use of such a method of approach as an accepted sampling technique.

Knowledge of the type and magnitude of radiological contamination under the paint would define the remaining work to be accomplished before OU-15 IHSSs could be closed for radiation with the understanding that the HPGe detector would only measure the radioactive elements in the top inch of the concrete. Once this radiological contamination is defined, an evaluation of control options would have to be undertaken and one option selected and mutually agreed upon by both DOE and the regulators. This presumes that sufficient radiological contamination is found to warrant remediation. Should the option of removal of the paint and the contaminated concrete be selected, this would be decontamination for the purpose of subsequent use by others.

The Phase I Work Plan will have to be changed or a Phase II Work Plan will have to be prepared to address HPGe sampling, if used, and follow-on work necessary to close OU-15.

Dr. Fitch asked the CDH and the EPA representatives if they supported looking under the paint.

Mr. Swanson stated that he supported the under paint investigation for radiological contamination and Mr. Maxwell stated that it was his opinion that very little was to be gained by conducting such an investigation on an interim basis.

Mr. Maxwell further asked that, if a ROD could not be obtained for some reason, how would it affect DOE and/or EG&G? Mr. Maxwell took an action item to investigate the feasibility of using a ROD and stated that he would provide the results of this investigation to Dr. Fitch.

The meeting concluded at 11:30 AM.